



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

149517

June 3, 1997

REPLY TO THE ATTENTION OF:  
SR-6J

Scot Cornelius  
Superfund Section  
Michigan Department of Environmental Quality  
P.O. Box 30426  
Lansing, MI 48909

Re: King Highway Landfill Operable Unit of Allied Paper/  
Kalamazoo River Site

Dear Scot:

I have reviewed the revised Proposed Plan for the King Highway Landfill Operable Unit. The document seems much too detailed for a Proposed Plan, at least compared to the Proposed Plans for other sites on which I have worked. You may want to refer to my comments on the King Highway draft ROD and the Proposed Plan for 12th Street Landfill for relevant comments. In addition, I have the following comments:

**Introduction:**

KHL and OU3 need to be defined before they are first used.

Under CERCLA, U.S. EPA selects the remedy, not MDEQ.

**History of the KHL-OU3:**

Why don't you define the five former lagoons as part of KHL-OU3? I presume that by stating that the five former lagoons are within the site, that you mean the overall Kalamazoo River Site. It would be simpler to consider everything being done under this action as part of KHL-OU3.

**Site History:**

The first sentence is incomplete.

**Summary of Preferred Alternative:**

In my opinion, verification sampling should also be conducted in the River.

I suggest that the potential means for dewatering be mentioned.

Under "Floodplains" you identify the NREPA, Part 201, generic residential cleanup standard as 2.3 ppm, while under the "Five Former Lagoons", the standard is identified as 21 ppm.

About how many feet of clean soil will be placed over the residual contaminated soil at the five former lagoons?

**Reduction of Toxicity, Mobility, or Volume Through Treatment:**

Alternative 1 would reduce the mobility of PCBs, but I believe that it is incorrect to state that Alternative 1 would "eliminate" this mobility.

**Implementability:**

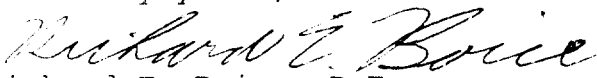
No implementation criteria were identified.

**State Acceptance:**

Again, the State does not approve the remedy.

If you have any questions, feel free to contact me at (312) 886-4740.

Sincerely yours,

  
Richard E. Boice, P.E.  
Remedial Project Manager